

SUE A. GALLAGHER, City Attorney (SBN 121469)
JOHN J. FRITSCH, Assistant City Attorney (SBN 172182)
City of Santa Rosa
100 Santa Rosa Avenue, Room 8
Santa Rosa, California 95404
Telephone: (707) 543 3040
Facsimile: (707) 543 3055

Attorneys for Defendant
CITY OF SANTA ROSA (erroneously sued herein as SANTA ROSA POLICE
DEPARTMENT)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DANA BRYANT AND MICHAEL
BRYANT dba CROSSING THE
JORDON,

Plaintiffs,

v.

GAVIN NEWSOM, in official capacity
as Governor of California, *et al.*

Defendants.

CASE NO. 3:20 cv 3243 VC

**STIPULATION AND ~~[PROPOSED]~~
ORDER RE DISMISSAL WITH
PREJUDICE**

42 U.S.C. § 1983

[DEMAND FOR JURY TRIAL]

Judge: The Hon. Vince Chhabria

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
above entitled action, by their respective counsel, as follows:

1. All claims against Defendant City of Santa Rosa (erroneously sued herein
as Santa Rosa Police Department) and all City of Santa Rosa related Does
Department shall be dismissed with prejudice.
2. Plaintiffs Dana Bryant and Michael Bryant, and Defendant City shall bear
their own attorney's fees and costs; waive any claim for attorney's fees
and costs; and waive any appellate rights.
3. Plaintiffs Dana Bryant and Michael Bryant, and each of them, hereby
release and waive any claim Plaintiffs Dana Bryant and Michael Bryant
may have whether known or unknown against City and any employee or

agent of City arising from the incident described in the operative First Amended Complaint on file herein. (Civil Code section 1542 waiver)

OFFICE OF THE CITY ATTORNEY

/s/ John J. Fritsch

Dated: October 14, 2020

John J. Fritsch
Assistant City Attorney
Attorney for Defendant
City of Santa Rosa (erroneously sued herein as
Santa Rosa Police Department)

/s/ Matthew Becker

Dated: October 14, 2020

Matthew Nicholas Becker
Attorney for Plaintiffs Dana Bryant and
Michael Bryant

ORDER

Pursuant to the stipulation of the parties and for good cause shown, IT IS SO ORDERED, that all claims are hereby dismissed against Defendant City of Santa Rosa (erroneously sued herein as Santa Rosa Police Department) and all City related Does with prejudice. Each party shall bear its own attorney's fees and costs.

Dated: October 16, 2020

HON. VINCE CHHABRIA
District Judge, U.S. District Court

